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*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA  
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA, and  
BRUCE MAPLEY SR.,

Defendants,

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
Cross Claimant,

BRUCE MAPLEY, SR.,  
Cross Defendant.

Case No. CV-20-52-BLG-SPW

**PLAINTIFFS' MOTION TO  
COMPEL RE: THE HARDIN  
CONGREGATION SUBPOENA**

COMES NOW, Plaintiffs, by and through undersigned counsel, and respectfully moves the Court for an order providing:

1. The Hardin Congregation of Jehovah's Witnesses ("Hardin Congregation") may not withhold documents responsive to Plaintiffs' Subpoena based on the unrecognized *third-party privacy, congregant expectation of confidentiality, and elder expectation of confidentiality* privileges; and
2. The Hardin Congregation shall timely supplement its privilege log with enough detail to assess whether the clergy penitent privilege justifies withholding documents responsive to Plaintiffs' Subpoena.

A Brief in Support, along with a copy of the subpoena documents at issue, are being filed contemporaneously with this Motion. Defendants Watch Tower Bible and Tract Society of Pennsylvania and Watchtower Bible and Tract Society of New York, Inc. were contacted regarding this Motion and they reserve the right to object. Defendant Bruce Mapley, Sr. was contacted regarding this Motion and no response was received.

DATED this 21<sup>st</sup> day of April, 2021.

By: /s/ Ryan Shaffer  
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